



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

April 7, 2014

Idaho Panhandle National Forests
Attn: Mary Farnsworth, Forest Supervisor
3815 Schreiber Way
Coeur d'Alene, Idaho 83815

Re: EPA Region 10 comments on the Beaver Creek Project Final Environmental Impact Statement and Draft Record of Decision. EPA Project Number: 13-0004-AFS

Dear Ms. Farnsworth:

This review was conducted in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act.

In our July 23, 2013 comments on the Beaver Creek Project DEIS we stated our belief that Alternative 3 would be environmentally preferable for the following reasons:

- Alternative 3's watershed improvement activities (including 12 aquatic organism passage repairs) would result in over 9 additional miles of stream available to fish, as compared to 4.5 miles for Alternative 2 (8 aquatic organism passage repairs).
- Alternative 3's vegetation management activities (including 360 acres of aggregate retention) would result in, for example, improved effects on elk habitat quality. We generally recognize the inclusion of both aggregated and dispersed retention, as compared to just dispersed retention for Alternative 2, as environmentally preferable because we believe reflecting natural disturbance patterns requires flexibility in retention patterns.
- Alternative 3's road management (including 104 miles of road decommissioning) would decrease known sediment contributions from roads by over 74%, as compared to 65% for Alternative 2 (66 miles of road decommissioning).

Because we believe these elements of Alternative 3 are environmentally preferable, we support your inclusion of Alternative 3's 12 culvert repairs and aggregate retention harvest prescriptions in the Draft ROD's Selected Alternative. We also appreciate that the Draft ROD's Selected Alternative includes 7.4 more miles of decommissioning than Alternative 2. The Draft ROD usefully describes the future vegetation management reasons for not selecting all of Alternative 3's road decommissioning.¹

In addition to specifically appreciating the Draft ROD Selected Alternative's inclusion of environmentally preferable elements, we reiterate our agreement that the action alternatives better promote a resilient forest, reduce hazardous fuels and improve water quality and aquatic habitat than the no-action alternative.

¹ Draft ROD, p. 13

Thank you for this opportunity to comment and if you have any questions please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or you may contact Erik Peterson of my staff at (206)-553-6382 or by electronic mail at peterson.erik@epa.gov.

Sincerely,

A handwritten signature in blue ink, reading "Christine B. Reichgott". The signature is fluid and cursive, with the first name "Christine" and last name "Reichgott" clearly legible.

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit